

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

VIRGINIA COLE, *on behalf of herself*)
and others similarly situated,)

Plaintiff,)

v.)

Case No. 3:25-cv-00639

GENSTONE ENTERPRISES, LLC,)

Defendant.)

**JOINT MOTION TO STAY PROCEEDINGS AND CONTINUE INITIAL CASE
MANAGEMENT CONFERENCE**

Plaintiff Virginia Cole (“Plaintiff”) and Defendant GenStone Enterprises, LLC (“GenStone”) (collectively, the “Parties”) jointly move for an order staying proceedings and any deadlines for ninety (90) days to allow the Parties to continue to explore potential resolution. In support thereof, the Parties state:

1. Plaintiff filed its Complaint on June 9, 2025.
2. GenStone was served with a copy of the Summons and Complaint on July 14, 2025.
3. On July 28, 2025, Plaintiff moved to continue the Initial Case Management Conference that was originally set for August 6, 2025.
4. On July 29, 2025, the Court granted Plaintiff’s motion and reset the Initial Case Management Conference to September 8, 2025.
5. On July 31, 2025, GenStone filed its Unopposed Motion for Extension of Time to Respond to Plaintiff’s Complaint, requesting to extend its response deadline from August 4, 2025 to September 4, 2025.

6. On August 1, 2025, the Court granted GenStone's motion, extending its response deadline to September 4, 2025.

7. Since Plaintiff filed its Complaint, the Parties have engaged in an informal exchange of information with the intention of reaching a resolution of this action and require additional time to continue exchanging information and engaging in potential settlement negotiations.

8. Accordingly, the Parties respectfully request the Court stay all proceedings and deadline in this action, including continuing the Initial Case Management Conference set on September 8, 2025, for ninety (90) days.

9. The Parties believe their proposed stay is in the best interest of judicial economy as it will conserve resources and promote judicial efficiency. *See* Fed. R. Civ. P. 1 (the rules "should be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding").

10. This request is not made for the purpose of delay or harassment, and no party will be prejudiced by the stay in proceedings.

WHEREFORE, the Parties respectfully request the Court enter an order staying proceedings and any deadlines in this action for ninety (90) days.

Dated: August 25, 2025

Respectfully submitted,

/s/ John W. Peterson

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CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2025, I electronically filed the foregoing *Joint Motion to Stay Proceedings and Continue Initial Case Management Conference* with the Clerk of Court using the CM/ECF system, which served the same upon the following counsel of record:

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